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IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOHNNY MARTINEZ MEDINA,

Defendant.

Case No. 2:24mj982-DAO

FELONY COMPLAINT

COUNT 1

Violation of 18 U.S.C. § 844(f)(1)  
(Arson of Federal Property by Means of  
Fire)

COUNT 2

Violation of 18 U.S.C. § 844(f)(1)  
(Arson of Property Receiving Federal  
Funds by Means of Fire)

COUNT 3

Violation of 18 U.S.C. § 844(f)(1)  
(Arson of Federal Property by Means of  
Fire)

Magistrate Judge Daphne A. Oberg

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Before the Honorable Jared C. Bennett, United States Magistrate Judge for the  
District of Utah, appeared the undersigned, who on oath deposes and says:

COUNT 1

18 U.S.C. § 844(f)(1)  
(Arson of Federal Property by Means of Fire)

On or about September 13, 2024, in the District of Utah,

JOHNNY MARTINEZ MEDINA,

defendant herein, maliciously damaged or destroyed, and attempted to damage or destroy, by means of fire, real property, the paved area near the entrance to the Orrin G. Hatch U.S. Courthouse located at 351 S. West Temple, Salt Lake City, Utah, in whole or in part owned or possessed by, or leased to, the United States, or any department or agency thereof, or any institution or organization receiving Federal financial assistance, in violation of 18 U.S.C. § 844(f)(1).

**COUNT 2**

18 U.S.C. § 844(f)(1)

(Arson of Property Receiving Federal Funds by Means of Fire)

On or about September 21, 2024, in the District of Utah,

JOHNNY MARTINEZ MEDINA,

defendant herein, maliciously damaged or destroyed, and attempted to damage or destroy, by means of fire, real property, the Salt Lake City International Airport located at W. Terminal Dr, Salt Lake City, Utah, in whole or in part owned or possessed by, or leased to, the United States, or any department or agency thereof, or any institution or organization receiving Federal financial assistance, in violation of 18 U.S.C. § 844(f)(1).

**COUNT 3**

18 U.S.C. § 844(f)(1)

(Arson of Federal Property by Means of Fire)

On or about September 22, 2024, in the District of Utah,

JOHNNY MARTINEZ MEDINA,

defendant herein, maliciously damaged or destroyed, and attempted to damage or destroy, by means of fire, real property, the Wallace F. Bennett Federal Building located at 125

State St., Salt Lake City, Utah, in whole or in part owned or possessed by, or leased to, the United States, or any department or agency thereof, or any institution or organization receiving Federal financial assistance, in violation of 18 U.S.C. § 844(f)(1).

### **STATEMENT OF PROBABLE CAUSE**

1. On September 13, 2024, Federal Court Security Officers (CSOs) observed a person set fire to a backpack set on the pavement near the front entrance to the Orrin G. Hatch U.S. Courthouse. CSOs and U.S. Marshals detained the man and extinguished the fire. Federal Protective Service Officers responded to the scene and identified the person as JOHNNY MARTINEZ MEDINA. MEDINA told officers that he set the backpack on fire so that he could go to jail. Officers cited MEDINA and released him from the scene. A short time later, MEDINA vandalized a Utah Highway Patrol vehicle at the Utah State Capital by throwing a rock through a window in the presence of Utah State Highway Patrol troopers. MEDINA was arrested by the Utah Highway Patrol and booked into the jail.

2. On September 21, 2024, MEDINA was arrested after climbing over a fence into the secure area and walking several hundred feet onto the aircraft taxiway/tarmac of the Salt Lake City International Airport. MEDINA set fire to a blanket and was standing around the fire when he was observed by Salt Lake City Police Officers. MEDINA was detained, and the fire was extinguished by responding police officers before the fire department arrival. MEDINA did not make any statements. MEDINA was arrested for trespassing and reckless burning before being transported to the Salt Lake County Jail. The incident was captured on surveillance video and body worn cameras.

3. On September 22, 2024, MEDINA was arrested after security officers observed a trash fire in the entryway of the Wallace F. Bennett Federal Building. Officers reported a fire approximately three feet in height in the revolving door of the building. Security officers quickly extinguished the fire and observed MEDINA walking away from the area. Security officers followed MEDINA to the parking lot and observed MEDINA using a handheld lighter to attempt to set fire to a tarp covering a federal government boat. MEDINA was detained until the Salt Lake City Police Department arrived and took custody of MEDINA. MEDINA was arrested for felony arson with damages between \$1500-\$4999. The incident was captured on surveillance video and body worn cameras.

4. The elements for a violation of 18 U.S.C. § 844(f)(1), arson of federal property or property receiving Federal funds by means of fire, are (1) the defendant maliciously damaged, destroyed, or attempted to damage or destroy; (2) a building, vehicle, or other personal or real property; (3) by means of fire or an explosive; and (3) the property is whole or in part owned or possessed by, or leased to, the United States, or any department or agency thereof, or any institution or organization receiving Federal financial assistance.

5. Based on the aforementioned facts, I believe that there is probable cause that JOHNNY MARTINEZ MEDINA committed the offenses maliciously damaging or destroying, or attempting to damage or destroy, by means of fire, property of the United States, or property of any institution or organization receiving federal financial assistance, in violation of 18 U.S.C. § 844(f)(1).

6. I swear that this information is true and correct to the best of my knowledge, information, and belief. I further request a warrant for arrest be issued based upon the facts set forth herein.

DATED this 4<sup>th</sup> day of October, 2024.

/s/ Tyler Olson  
Tyler K. Olson, Special Agent  
Bureau of Alcohol, Tobacco,  
Firearms & Explosives

SUBSCRIBED and SWORN before me this 4<sup>th</sup> day of October, 2024.

Daphne A. Oberg  
DAPHNE A. OBERG  
Magistrate Judge, District of Utah

APPROVED:

TRINA A. HIGGINS  
United States Attorney

/s/ Cameron P. Warner  
Cameron P. Warner  
Assistant United States Attorney